

LAW OFFICE OF
MICHAEL K. BACHRACH
224 WEST 30TH STREET, SUITE 302
NEW YORK, N.Y. 10001
TEL. (212) 929-0592 • FAX. (866) 328-1630

MICHAEL K. BACHRACH *
* admitted in N.Y., MN and D.C.

<http://www.mbachlaw.com>
michael@mbachlaw.com

June 12, 2025

By ECF

The Honorable Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

***Re: United States v. Dante Johnson,
22 Cr. 640 (KMK)***

Dear Judge Karas:

I represent Defendant Dante Johnson in the above-referenced matter and write to respectfully request a continuance of Mr. Johnson's July 10, 2025, sentencing hearing to September 15, 2025, or a date thereafter that is convenient to the parties and to the Court.

Mr. Johnson's sentencing hearing is presently scheduled for July 10, 2025, at 2:00 p.m. That date and time is no longer available for the undersigned as I am now scheduled to meet with the Attorney General's Capital Review Committee at that time in United States v. José E. Ortiz-Colón, 23 Cr. 273 (PAD) (D.PR), to provide reasons why the current Administration should not reverse the prior Administration's decision not to seek the death penalty against my client. That case is considered at risk for a no-seek reversal in that my client and his co-defendants are alleged to have participated in a "massacre", as described in the Indictment, wherein five people were intentionally killed while having drinks outside of a bar in Puerto Rico. I have asked for a later date for the meeting with the Capital Review Committee, however that request has been denied.

A continuance of at least 60 days, rather than merely to the next week, is necessary to take account of motions that I have in another high-risk capital case, United States v. Fawaz Ahemeid, 20 Cr. 502 (BMC) (EDNY), wherein my client is charged with his involvement in three separate terrorists attacks occurring in the Mali in which 38 people were killed including five U.N. workers and one U.S. citizen. A meeting with the Attorney General's Capital Review Committee took place on June 9, 2025. I also have pretrial motions due in a non-capital case, United States v. Joseph Lanni, 23 Cr. 443 (FB) (EDNY), on July 23, 2025. Finally, I will be working remotely in Illinois from on or about July 28, 2025, through Labor Day. I can return to New York during that time period, if needed, but it would be greatly appreciated if that could be avoided.

The Honorable Kenneth M. Karas
June 12, 2025
Page 2 of 2

I have emailed with AUSA Ryan Allison, and he has informed me that the Government consents to the instant application.

Accordingly, the undersigned respectfully requests that Defendant Dante Johnson's July 10, 2025, sentencing hearing be adjourned to September 15, 2025, or as soon thereafter that is convenient to the parties and the Court.

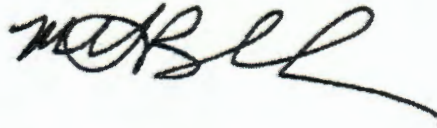
Thank you for your time and consideration.

Granted. Sentence is adjourned to
10/ 9 /25, at 10 :00

So Ordered

6/16/25

Respectfully submitted,



Michael K. Bachrach
Attorney for Dante Johnson

cc: All parties of record (by ECF)